

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)	Case No. 22-10571
)	
Matthew M. Motil,)	Chapter 7
)	
Debtor.)	Judge Harris

**DEBTOR’S RESPONSE TO UNOPPOSED MOTION OF THE U. S. TRUSTEE TO
EXTEND TIME IN WHICH TO FILE A COMPLAINT OBJECTING TO
DISCHARGE PURSUANT TO 11 U.S.C. SECTION 727**

1. The Debtor does not oppose the Motion of the U.S. Trustee for an extension of time through August 3, 2022 to file a Complaint objecting to discharge under Section 727(a). The extension was agreed upon in advance, as the Motion indicates.

2. The U. S. Trustee has correctly described the requests for documents issued by the U. S. Trustee. The document request is substantial, and the Debtor and his undersigned counsel are in the process of assembling responsive documents.

3. The Debtor disagrees with language set forth in Paragraph 3 of the Motion of the U. S. Trustee reading: “On information and belief, the Debtor solicited unsophisticated and unaccredited investors to participate in various real estate investments that the Debtor directed.” The Debtor objects to this statement because the facts of this case will show that the Debtor did not “solicit” anyone, let alone “unsophisticated and unaccredited” “investors” to “participate” in various real estate “investments” that the Debtor “directed.”

4. Instead, the facts of this case will demonstrate that several wealthy individuals made loans to businesses owned by the Debtor in the hopes of earning exceptionally high rates of interest, and that those individuals did so heedless of the risks of making high interest loans without

performing reasonable due diligence and/or obtaining assistance in understanding and obtaining appropriate real estate collateral.

5. The Debtor also objects to the language of Paragraph 3 made “on information and belief” by the U. S. Trustee at a time when the Trustee has not yet been able to review documents in the case or otherwise complete a thorough investigation of the relevant facts and circumstances. It is therefore not clear upon what “information” the “belief” of the U. S. Trustee is based.

6. The Debtor in this case, and his undersigned counsel, have a great deal of respect for the critical work performed by the U. S. Trustee, and particularly, for the Trial Attorney for the U. S. Trustee in this case. However, the Debtor believes it is necessary to appropriately and respectfully challenge the statements set forth in Paragraph 3 of the Motion.

Respectfully submitted,
/s/Thomas W. Coffey
Thomas W. Coffey (0046877)
Coffey Law LLC
2430 Tremont Avenue
Cleveland, OH 44113
(216) 870-8866
tcoffey@tcoffeylaw.com

Counsel for the Debtor

Certificate of Service

I hereby certify that a copy of the foregoing Debtor’s Response To Unopposed Motion of the U. S. Trustee to Extend Time in Which to File a Complaint Objecting To Discharge Pursuant to 11 U.S.C. Section 727 was served on Scott R. Belhorn, Trial Attorney for the U. S. Trustee and all other counsel of record in this case through the Court’s electronic filing system on this 9th day of June, 2022.

/s/ Thomas W. Coffey
Thomas W. Coffey (0046877)